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U.S. BANKRUPTCY COURT
MARY A. SCHOTT, CLERK

1 Sheila K Stuppy -- Debtor Pro Se
2 7428 Rowdy St
3 Las Vegas, NV 89136
4 (702) 493-2983
5

6 UNITED STATES BANKRUPTCY COURT
7 LAS VEGAS DISTRICT OF NEVADA
8

9
10 In Re:

11 Sheila K Stuppy

12 Debtor
13
14

Case No: 09-19788-lbr

Chapter: 11

Hearing Date: 07 / 29 / 2009

Hearing Time: 1:30 PM

15 DEPTORS OPPSITION
16 TO SECURED CREDITORS MOTION FOR
17 RELIEF FROM THE AUTOMATIC STAY.

18 I Sheila K Stuppy, Debtor in Possession Pro Se, (hereafter the "Debtor") in the entitled
19 Chapter 11 Bankruptcy **Oppose the Motion for Relief from the Automatic Stay** filed by the
20 secured creditor HSBC Bank USA, National Association, as Trustee for ACE Securities Corp.
21 Home Equity Loan Trust, Series 2006 ASAP1, by and through their Attorney Gregory L Wilde
22 of Wilde & Associates, 208 S. Jones Blvd, Las Vegas, NV 89107 herein, ("Secured Creditor" or
23 "Movant" hereafter) requesting that the Court deny the Secured Creditor's Motion for Relief
24 from the Automatic Stay based upon the following:

25 1. The following Real Property that is the Subject of the Motion is:

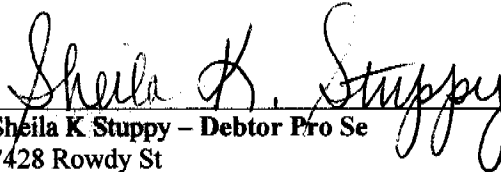
26 6664 Artic Breeze St
27 N Las Vegas, NV 89084
28 Parcel # 124-19-311-028

- 1 2. I am "The Debtor in Possession" of the above property, and subject of the Motion.
- 2 3. The Real Property that is the subject of the motion, as well as all of my Real
- 3 Property listed in the Chapter 11 Bankruptcy Documents is needed, by me the debtor, to
- 4 workout a feasible, fair, equitable, effective plan of reorganization with adequate means
- 5 of execution.
- 6 4. Adequate protection does exist if the Court will allow me the Debtor to use "Cash
- 7 Collateral" pursuant to 11 U.S.C. 363.
- 8 5. I the Debtor request interim authorization for use of cash collateral be given to me under
- 9 Bankruptcy Rule 4001(b)(2) allowing me the Debtor to use Cash on hand and proceeds
- 10 from all of my distributions and /or earnings.
- 11 6. I the Debtors am engaged in the practice of real estate, NV Realtor License # S.0041468,
- 12 and I am managing my assets as debtors in possession in accordance with 11 U.S.C.1107.
- 13 7. No examiner or trustee has been appointed in this entitled Chapter 11 cases, and no
- 14 official committee representing any of the unsecured creditors has yet been appointed.
- 15 8. The automatic stay is the essential in providing me the Debtor the proper amount of time
- 16 to protect all parties of interest while I accomplish the objectives of the Bankruptcy
- 17 Code. *In re Flores*, 291 B.R. at 50-51 (citations omitted).
- 18 9. The automatic stay is designed to offer me, the debtor repose from my creditors'
- 19 collection efforts. *In re Bird*, 229 B.R. 90, 94 (Bankr.S.D.N.Y. 1999), without the
- 20 automatic stay neither reorganization and rehabilitation under Chapters 11, nor
- 21 liquidation and orderly and equitable distribution of my bankruptcy estate under Chapter
- 22 7, would be possible.
- 23 10. I the Debtor am willing to reinstate and maintain all obligations under all of the Deeds of
- 24 Trust that Encumbering the subject property.

25 **WHEREFORE** I the Debtor, Sheila K Stuppy pray that the Court Deny and Dismiss the
26 Secured Creditor Relief from the Automatic Stay.

27
28

Submitted this 13 Day of July 2009 by Shiela K Stuppy, Debtor in Possession, Pro Se.



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Las Vegas, NV 89136
(702) 493-2983

Copy Faxed to:

Attorney(s) for Secured Creditor

HSBC Bank USA, National Association, as Trustee for ACE Securities Corp. Home Equity
Loan Trust, Series 2006 ASAP1

Attorney Gregory L Wilde

WILDE & ASSOCIATES

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(702) 258-8787 - FAX

and

Attorney Mark S Bosco

TIFFANY & BOSCO

2525 E Camelback Rd # 300
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300 Las Vegas Blvd. South, Suite 4300

Las Vegas, Nevada 89101
(702) 388-6658 - FAX

E-filed on: N / A

Sheila K Stuppy – **Debtor Pro Se**
7428 Rowdy St
Las Vegas, NV 89136
(702) 493-2983

**UNITED STATES BANKRUPTCY COURT
LAS VEGAS DISTRICT OF NEVADA**

In re:

Sheila K Stuppy

Debtor(s)

Case No.: 09-19788-lbr

Chapter 11

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CERTIFICATE OF SERVICE

Do not use this form to prove service of a summons and complaint. To prove service of a summons and complaint use the certificate in the court form entitled "Adversary - Summons and Notice of Scheduling Conference in an Adversary Proceeding" which is available on the court's website at www.nvb.uscourts.gov.

1. On 7-13-09 (date) I served the following document(s) (specify):

DEPTORS OPPSITION
TO SECURED CREDITORS MOTION FOR
RELIEF FROM THE AUTOMATIC STAY.

2. I served the above-named document(s) by the following means to the persons as listed below:

(Check all that apply)

☐ **a. ECF System** *(You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary)*

☐ **b. United States mail, postage fully prepaid**
(List persons and addresses. Attach additional paper if necessary)

☐ **c. Personal Service** *(List persons and addresses. Attach additional paper if necessary)*

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the documents(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the documents(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

☐ d. By direct email (as opposed to through the ECF System)
(List persons and email addresses. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ e. By fax transmission (List persons and fax numbers. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

Attorney Gregory L Wilde
WILDE & ASSOCIATES
208 S Jones Blvd
Las Vegas, NV 89107
(702) 258-8787 - FAX

Attorney Mark S Bosco
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2525 E Camelback Rd # 300
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Office of the United States Trustee
300 Las Vegas Blvd. South, Suite 4300
Las Vegas, NV 89101
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☐ f. By messenger (List persons and addresses. Attach additional paper if necessary)

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.
(A declaration by the messenger must be attached to this Certificate of Service).

I declare under penalty of perjury that the foregoing is true and correct.

Signed on (Date): 7/13/09

Marge Shroba
(NAME OF DECLARANT)

Marge Shroba
(SIGNATURE OF DECLARANT)